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Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff.

1

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC

Defendants

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MARTHA L.
GOODMAN IN SUPPORT OF
DEFENDANTS UBER TECHNOLOGIES,
INC.'S AND OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL THEIR SUPPLEMENTAL
BRIEF IN OPPOSITION TO WAYMO'S
MOTION *IN LIMINE* NO. 14 TO EXCLUDE
EVIDENCE OF LEVANDOWSKI'S
FAILURE TO COOPERATE**

Judge: Hon. William H. Alsup
Trial Date: December 4, 2017

1 I, Martha L. Goodman, declare as follows:

2 1. I am an associate with the law firm Boies Schiller Flexner LLP, representing Defendants
 3 Uber Technologies Inc. and Ottomotto LLC (collectively, “Uber”) in this matter. I am a member in
 4 good standing of the Bar of the District of Columbia, and I make this declaration in support of Uber’s
 5 Administrative Motion to File Under Seal Its Supplemental Brief In Opposition To Waymo’s Motion In
 6 Limine No. 14. I make this declaration based on personal knowledge and if called as a witness, I could
 7 and would competently testify to the matters set forth herein.

8 2. I have reviewed the following documents and confirm that only the portions identified
 9 below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Opposition Brief	Yellow-highlighted portions	Non-Party John Gardner

10 14 3. The yellow-highlighted portions of the Opposition Brief contains information that Non-
 11 Party John Gardner considers or may consider “Confidential” and/or Highly Confidential – Attorneys’
 12 Eyes Only” under the Protective Order, and that Gardner asked Uber to file under seal.

13 4. Defendants’ request to seal is narrowly tailored to those portions of the Opposition Brief
 14 that merit sealing under the local rules and the protocol entered by the Special Master.

15 5. Pursuant to Civil Local Rule 79-5(d)(2), Uber will lodge with the Clerk the highlighted
 16 versions documents at issue, with accompanying chamber copies.

17 6. I declare under penalty of perjury under the laws of the United States that the foregoing is true
 18 and correct. Executed this 25th day of October, 2017, in Washington, DC.

19 24 /s/ Martha L. Goodman
 20 Martha L. Goodman

1 **ATTESTATION OF E-FILED SIGNATURE**

2 I, Karen L. Dunn, am the ECF User whose ID and password are being used to file this
3 Declaration. In compliance with General Order 45, X.B., I hereby attest that Martha L. Goodman has
4 concurred in this filing.

5 */s/ Karen L. Dunn*

6 Karen L. Dunn